



## SFIS Privacy Statement

Silver Fern International School (SFIS) inspires internationally-minded, balanced learners who thrive and become active global citizens. To help our community thrive, and to implement all necessary safeguarding to meet that purpose, we are committed to protecting the personal data of staff, parents, students and the wider community as we collect and process this data.

SFIS is committed to safeguarding personal data in accordance with Thailand's Personal Data Protection Act BE 2562 (2019) ("PDPA"). This Privacy Statement (Statement) has been developed in line with Thailand and international data protection regulations.

### What personal data we process

We may collect and process the following personal data about you and any child you are responsible for:

- Biographical and identification information – including name, gender, nationality, date and place of birth, details of family members, employment, passport and national identity information;
- Contact information – including address(es), telephone number(s), email address(es), emergency contacts;
- Child information – this includes admission information (e.g. tests scores), start date, year group, class information, school ID, grades, notes, timetables, transport routes and communications with Parents or Guardians, teachers and other children, information relating to reports made by/concerning child/children (e.g. bullying reports etc.), health/medical Information to maintain a safe environment, and photographs of a child, so that we can identify them for security purposes.
- Payment information – including bank account and credit/debit card information;
- Our correspondence – where we are contacted by you or a child you are responsible for, we will keep a record of that correspondence;
- Website and communication usage – details of visits to our websites and information collected through cookies and other tracking technologies including, IP address and domain name, browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that are accessed;
- Information you have provided to us – any additional information that you or a child you are responsible for may provide to us, such as through completing enquiry or feedback forms.

### Special Category Data

At times some of the personal data that we collect and process may include what is defined as "sensitive personal data" under the PDPA. This includes, but is not limited to:

- Race
- Religion
- Health
- Records of misconduct and disciplinary action
- Records of criminal offence



# SILVER FERN INTERNATIONAL SCHOOL

16 Moo 21 Airport Road, Tambon Neua Muang, Amphoe Muang, Roi-Et 45000, Thailand

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This sensitive information shall be treated carefully by SFIS and will only be used for specific purposes. It will not be released to a third party without your explicit consent unless it is necessary to protect your interests or where we are required to by law, or where we have good reason in protecting the vital interests of an individual, or where not doing so would place someone else at risk. The provision of all information requested for in the relevant forms for SFIS is mandatory, unless specified otherwise. This is to enable us to process your application and/or request for our services in our provision of education to your child(ren).

## How is your data collected?

Most, if not all, of your personal data was obtained from you directly, either from the following sources or from any other information you provided and this may include:

- Enquiries to the school
- Various applications and registration forms
- All other school and services-related request forms
- Previous qualifications, certificates and similar documents
- Through forms on the website or data collected through your use of the website or applicable online systems the school uses

We may also obtain personal data from you (or any child you are responsible for) directly, or from third parties such as other educational or sporting institutions, sanctions and politically exposed persons screening lists, our business partners and public registers.

## How we use personal data

SFIS collects personal data and sensitive categories of personal data of students, parents, employees and alumni to provide a safe and caring international environment for teaching, learning and general educational purposes. We use the information you provide for purposes that are necessary and required to undertake the performance of the contract into which you are entering, or have entered into, and do so as we are required to do by law.

We use the information you provide in the following ways:

- to provide a safe learning environment
- to undertake and manage SFIS admissions and enrollment
- to comply with child protection requirements
- to support and enable the academic, pastoral and personal objectives of children, including the monitoring and reporting of progress
- to provide support and care for emotional and psychological wellbeing (pastoral and counseling)
- to protect the health of the students and employees we serve
- to provide a tailored learning environment and make evidence based education decisions for the children we serve
- to enable students to take part in standardized or external assessments



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- to enable the children we serve to continue or progress their education at other educational organizations
- to monitor (where appropriate) the responsible and safe use of IT and communication systems
- to support and develop our employees in the performance of their duties
- to meet our statutory reporting requirements to authorities as required
- to help investigate any concerns or complaints you may have
- to ensure campus security including video surveillance
- to make you aware of services, information, news, events and activities that are undertaken at or in association with SFIS
- to maintain relationships with alumni and the extended SFIS community
- to respond to requests from former employees, parents and students for information related to their time at SFIS
- To improve the website or personalize the browsing experience or to send you information where requested through the website

## Basis on which SFIS processes personal data

We process personal data to carry out the education services as prescribed above. We do so under the lawful basis that the processing is necessary for the performance of a contract in which you are entering or have entered into. In some circumstances, we may have to process data for other purposes that are not necessary for the performance of the contract. In such cases, the processing may be based upon (i) our legitimate interests, such as providing a safe learning environment, maintaining the SFIS community, fundraising, etc., (ii) on the protection of you or your children's vital interests, (iii) on the compliance with our legal obligations and/or (iv) on the consent you or your children may have provided to us.

## Photographs and Videos

Photographs and videos are a key medium through which to record and share everyday life at SFIS to the parents, students, employees, alumni, the extended SFIS community, prospective families and the general public. SFIS uses such media for promotional purposes, including but not limited to: the SFIS website, printed publications, electronic newsletters and SFIS social media. Photographs and video are also generated for educational purposes (records of lessons, field trips, sports, events, staff professional development) by faculty and students and play an important role in the delivery of our teaching and learning programme. As members of the SFIS community, parents, students, employees and alumni may be photographed or filmed and these photographs, or film, used for promotional or educational purposes.

Photographs or videos used for promotional purposes will not identify individuals by their full name.

On enrolment parents have a choice for how the school uses media which includes no permission to use, limited usage or unrestricted usage.



## Sharing and Transfers of personal data

Your personal data will be shared internally within SFIS for the purposes of delivering the services required. For the purposes described in “How we use personal data” of this Statement, SFIS may need to share your personal data externally with certain recipients, as well as with third parties processing your data on behalf of SFIS. More specifically, this includes the following categories of recipients:

- Schools, colleges or universities that the students attend after leaving SFIS; Other international schools (amongst others for the purposes of trips, sports and activities);
- Family nurses, doctors or social service organizations (amongst others where sharing is in the vital interests, or where not sharing could have a negative impact on the individual);
- Providers of information systems that are necessary for SFIS to deliver the admissions, administration, teaching and learning, pastoral development, and child protection services;
- Providers of IT hosting and maintenance services;
- Government organizations, police, health and social care (where we are required to do so by law, or where we have obtained your consent to do so).

Personal data may also be transferred to other data processors. For such transfers of personal data, SFIS has implemented suitable safeguards.

## Data storage and retention

Personal data will be kept securely in accordance with the school’s data protection obligations. The School maintains a Retention Schedule (part of the Data Retention Policy) to ensure personal data is deleted after a reasonable time for the purpose for which it was being held, unless a law requires such data to be kept for a minimum time.

Personal information that is no longer required will be deleted in accordance with the Schools Data Retention Policy. For instance, for student records this information may be retained for a period of up to 25 years from birth or 35 years from birth for students with special education records. For most employee records, these will be retained for the duration of employment plus 10 years as per the Labour Protection Act.

For the website (or applicable online systems), transmitting information over the internet is not generally completely secure and we can’t guarantee the security of this data.

## Your Right to Access & Rectify

You have the right to access and correct your personal information held by SFIS under the PDPA. Any request to exercise your rights shall be administered as per the PDPA. Please be informed that pursuant to the PDPA, your request may be rejected in certain circumstances. Where the processing of your personal data is based upon consent, you and/or your child have the right to withdraw consent at any time. Such withdrawal of



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consent shall not affect the lawfulness of the processing based on consent before the withdrawal.

If you need clarifications, corrections, access to your information, withdrawal of consent for use of your personal data, or other information regarding your personal data kept with SFIS, you can contact the school office at: (+66) 099 467 1222